

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:15-cv-24067-CMA

ROTHSCHILD CONNECTED
DEVICES INNOVATIONS, LLC,

Plaintiff,

v.

THE COCA-COLA COMPANY,

Defendant.

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DECLARATION OF LEIGH M. ROTHSCHILD

I, Leigh M. Rothschild, hereby declare:

1. I am an adult resident of the State of Florida. I have resided in Miami-Dade County for over 40 years, and at all times relevant to this action.

2. I received my undergraduate degree from the University of Miami in 1973 and my graduate degree in Business Administration from the University of Miami School of Business in 1974.

3. My lifelong passion is inventing. I was issued my first United States Patent in my early twenties, and I have continued inventing since. I have been issued over 90 United States patents and I currently have over 150 other patent applications pending worldwide.

4. I am the sole inventor of United States Patent No. 8,417,377 (the “377 Patent”).

5. During my career I have been appointed to various technology policy organizations. I have served on the State of Florida’s Information Technology Board, at the request of then Governor Jeb Bush.



6. I founded the Rothschild Family Foundation, based in Miami-Dade. Through this Foundation, I have given endowments to various charities and institutions including the Tampa Children's Home, the Miami Symphony Orchestra, and the University of Miami School of Business. I have also funded the "Rothschild Entrepreneurial Prize" at the University of Miami School of Business.

7. I am the sole member of Rothschild Connected Devices Innovations, LLC ("RCDI"), a Texas limited liability company. Since its inception I have been RCDI's sole member.

8. I created RCDI – the plaintiff in this case – for the purpose of licensing and enforcing certain of my various inventions, including the '377 Patent.

9. I manage RCDI's affairs from Miami-Dade County.

10. All of the documents and files that RCDI maintains and that are relevant to this lawsuit, including any documents relating to the conception and reduction to practice of the claimed inventions, and to the prosecution, ownership, licensing and enforcement of the '377 Patent, are located in Miami, Florida.

11. It would be extremely expensive, wasteful of RCDI's limited resources, and substantially inconvenient for RCDI to litigate this case in Georgia.

12. RCDI has no contacts with Georgia. It has no offices in Georgia. It has no employees in Georgia. It is not registered to do business in Georgia. It has no contractors or customers in Georgia.

13. It is widely known that the domestic revenues of The Coca-Cola Company ("Coca Cola") are in the billions of dollars. Accordingly, it is my belief that Coca Cola can easily bear the cost of litigating in this forum, whereas a transfer of this case to Georgia would by comparison result in a substantial hardship to RCDI.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 8th day of April 2016 in Miami, Florida.



Leigh M. Rothschild